

# Exhibit E

*Certified Copy*

1                   IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
2                   STATE OF MISSOURI

3  
4           TRACEY YVETTE YOUNG, et al., )

5                               Plaintiffs, )

6                               vs. )

7           JOHNSON & JOHNSON; JOHNSON & )  
8           JOHNSON CONSUMER COMPANIES, )  
9           INC.; and IMERYS TALC )  
          AMERICA, INC., f/k/a )  
          LUZENAC AMERICA, INC., )

10                               Defendants. )  
11           ----- )

Case No.

1522-CC09728-02

12  
13                   VIDEO-RECORDED DEPOSITION OF

14                   WILLIAM E. LONGO, PhD

15  
16                   January 25, 2019

17                   9:24 a.m.

18  
19                   11555 Medlock Bridge Road  
20                   Suite 100  
21                   Johns Creek, Georgia

22                   Debra R. Luther, RMR, CRR, CCR-B-881



1 or is it MAS generally? I can't remember.

2 MR. CIRSCH: Object to form.

3 THE WITNESS: I don't know. I'd have to  
4 look at the affidavit.

5 Q. (By Mr. Ewald) Separate from the  
6 affidavit, do you have an estimate about how many  
7 products you have personally tested for the presence  
8 of asbestos over your career?

9 A. That I've personally tested?

10 Q. Personally tested.

11 A. Over my career?

12 Q. Yes.

13 A. Thousands.

14 Q. And how many of those occasions involved  
15 you analyzing the sample using PLM?

16 A. Not any, that I'm aware of. Those would  
17 all be TEM analysis.

18 Q. Have you ever personally analyzed a sample  
19 for the presence of asbestos using PLM?

20 A. From start to finish? No.

21 Q. What training, if any, do you have with  
22 respect to using PLM to analyze samples for the  
23 presence of asbestos?

24 A. I mean, besides understanding the  
25 procedure that's used and why you do the different --

1     how you gather the information for their refractive  
2     indices, the elongation, the dispersion staining, the  
3     procedure that's used and periodically will be asked  
4     by one of the analysts to take a look at this, what  
5     do you think, but I don't routinely -- I don't do PLM  
6     analysis.

7           Q.     How did you obtain the knowledge that you  
8     do have with respect to PLM?

9           A.     Well, over the years as a materials  
10    scientist, optical microscopy is one of the  
11    techniques that I have used to look at and identify  
12    things of interest, and as a PhD in materials science  
13    and as somebody who has used optical microscopes  
14    routinely and polarized light for looking at, I  
15    understand the principles of how it's done. I guess  
16    that's what PhDs do.

17          Q.     For the PLM testing for this January 2019  
18    report, do you have an understanding of what the  
19    analyst did to differentiate between  
20    tremolite/actinolite on one hand and anthophyllite on  
21    the other?

22          A.     The refractive indices, the extinction  
23    angle, which anthophyllite will go extinct parallel,  
24    depending on where the fibers are perpendicular,  
25    where tremolite/actinolite is oblique, and under

## C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF GWINNETT:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 126 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 26th day of January 2019.

*Debra R. Luther*  
DEBRA R. LUTHER, B-881  
Georgia Certified Court Reporter

